

March 7, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Prepaid Calling Card Provider Quarterly Reporting and Certification Pursuant to
47 C.F.R. § 64.5001(c), WC Docket No. 05-68

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 64.5001(c) of the Commission's rules, enclosed for filing with the Commission is TCS Communication Solutions, LLC's prepaid calling card provider report and corresponding certification ("Report") for the quarter ending December 31, 2018.

Thank you for your attention to this matter. Questions regarding this matter should be addressed to the undersigned.

Sincerely,

TCS Communication Solutions, LLC



Bruce Hollis

Attachment

**CONFIDENTIAL TREATMENT REQUESTED
NOT FOR PUBLIC INSPECTION**

STATE OF MARYLAND

COUNTY OF TALBOT

)
) ss.
)

**CONFIDENTIAL CERTIFICATION OF
TCS COMMUNICATION SOLUTIONS, LLC
PURSUANT TO 47 C.F.R. § 64.5001(c)**

I, Bruce Hollis, do hereby swear under oath that I am Managing Director and an officer of TCS Communication Solutions, LLC ("TCS"), and authorized to make the following certification pursuant to 47 C.F.R. § 64.5001(c).

1. My current office address is 13085 Lewistown Road, Queen Anne, MD 21657.
2. In accordance with 47 C.F.R. § 64.5001(c), TCS reports the following information with respect to prepaid calling card services provided by TCS during the calendar quarter ended December 31, 2018.
 - a. 47 C.F.R. § 64.5001(c)(1) Percentage of prepaid calling minutes by jurisdiction (rounded to nearest hundredth of a percent):

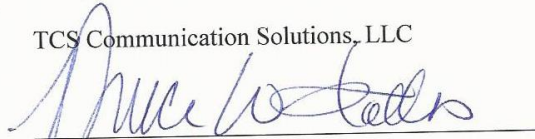
i. Intrastate	15.35%
ii. Interstate	21.76%
iii. International	62.89%
 - b. 47 C.F.R. § 64.5001(c)(2) Percentage of total prepaid calling card revenue attributable to interstate and international calls:

i. Interstate	11.17%
ii. International	80.17%
 - c. Pursuant to 47 C.F.R. § 64.5001(c)(3), TCS will make the required contribution to the federal Universal Service Fund based on the information reported in (b), above, if required to do so pursuant to FCC rules; At the present time TCS qualifies for the limited revenue exemption exception to direct contribution, pursuant to 47 C.F.R. § 54.706(c).
 - d. Pursuant to 47 C.F.R. § 64.5001(c)(4), I aver that information required in 47 C.F.R. § 64.5001(a) with respect to TCS was made available to the carrier from which it purchased transport services.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of March 2019.

TCS Communication Solutions, LLC



Bruce Hollis
Managing Director
13085 Lewistown Road
Queen Anne, MD 21657